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MANDALAY CORP. dba MANDALAY BAY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MALEK ARDALAN SADRI, an
individual,

Plaintiff,

v.

MANDALAY CORP. dba MANDALAY
BAY, a Nevada corporation; DOES 1
through 10 inclusive; ROE
CORPORATIONS/ENTITIES 1 through
10, inclusive,

Defendants.

CASE NO.: 2:17-cv-01400-RFB-CWH

**[PROPOSED] STIPULATED DISCOVERY
PLAN AND SCHEDULING ORDER**

**[SUBMITTED IN COMPLIANCE WITH
LR 26-1(b)]**

Pursuant to Federal Rule of Civil Procedure 26(f), Defendant MANDALAY CORP. and Plaintiff, MALEK ARDALAN SADRI, through their respective counsel, submit the following proposed Discovery Plan and Scheduling Order.

(1) Discovery Cut Off Date. The parties request a discovery period of one hundred eighty (180) days from June 22, 2017 the date Defendant MANDALAY CORP.'s Motion to Dismiss was filed. Therefore, the parties request that the discovery period close on **December 19, 2017**.

(2) Amending the Pleadings and Adding Parties. The date for filing motions to amend pleadings or to add parties shall be no later than ninety (90) days prior to the close of discovery: **September 20, 2017**.

1 (3) Expert Witness Disclosures. The disclosure of any expert witnesses shall be made
2 sixty (60) days before the discovery deadline: **October 20, 2017**. The disclosures of any rebuttal
3 experts shall be due thirty (30) days after the initial disclosures of experts: **November 20, 2017**
4 [November 19th being a Sunday].

5 (4) Dispositive Motions. Dispositive motions shall be filed not later than thirty (30) days
6 after the discovery cut-off date: **January 18, 2018**.

7 (5) Pretrial Order. The Joint Pretrial Order shall be filed not later than thirty (30) days
8 after the date set for filing dispositive motions: **February 17, 2018**. However, in the event that
9 dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until
10 thirty (30) days after a decision on the dispositive motions or further order of the Court.

11 (6) Joint Interim Status Report. The parties shall file a Joint Interim Status Report as
12 required by LR 26-3 no later than **October 20, 2017**.

13 (7) Rule 26(a)(3) Disclosures. The disclosures required by Rule 26(a)(3) and any
14 objection thereto shall be included in the Pretrial Order.

15 (8) Rule 26(a)(1) Initial Disclosures. The parties will make their Initial Disclosures on or
16 before **August 9, 2017**. No changes need to be made in the timing, form of requirements for such
17 disclosures.

18 (9) Electronically Stored Information. The parties are in the process of conferring
19 regarding ESI, including any methods for the disclosure of ESI. The parties will continue to discuss
20 ESI as necessary and will, if necessary, present the Court a form of production order, request a
21 conference with the Court, or present an appropriate Motion regarding such issues under Rule 26.

22 (10) Protection of Privileged/Trial Preparation Materials. At this time, the parties do not
23 anticipate any issues regarding claims of privilege or protection, but reserve the right to assert any
24 such claims in the future.

25 (11) Subjects on Which Discovery Will Be Conducted. The parties are in agreement that
26 discovery will be needed on the Plaintiff's claims, Defendants' denials, and the affirmative defenses
27 raised in the Answer. No changes should be made on the limitations of discovery imposed under
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1 Federal Rules of Civil Procedure or local rules.

2 (12) Alternative Dispute Resolution. The parties certify that they have met and conferred
3 about the possibility of using alternative dispute-resolution processes including mediation,
4 arbitration, and early neutral evaluation.

5 (13) Alternative Forms of Case Disposition. The parties certify they have considered
6 consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed.R.Civ.P. 73 and the use of
7 the Short Trial Program (General Order 2013-01). The parties do not so consent at this time.

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(14) Electronic Evidence. The parties certify they have discussed whether they intend to present evidence in electronic format to jurors for the purposes of jury deliberations. Discussions between the parties will be ongoing as the trial date approaches and any electronic evidence will be presented in a format compatible with the court's electronic jury evidence display system.

Discovery does not need to be conducted in phases or limited or focused on particular issues.

MGM Resorts International

The Thater Law Group, P.C.

/s R. Calder Huntington

/s M. Lani Esteban-Trinidad

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IT IS SO ORDERED

Dated this ____ day of July 2017

United States District / Magistrate Judge